

## UNITED STATES DISTRICT COURT

for the

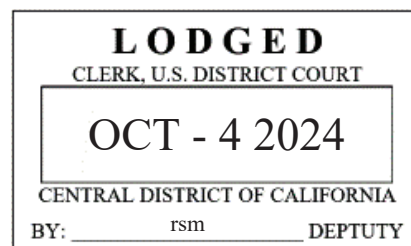
Central District of California

United States of America

v.

HANWEN LIU, aka HAN WEN LIU, aka  
DERRICK WONG, aka VICTOR LAO,

Defendant.

Case No. **2:24-mj-06136-DUTY**

**CRIMINAL COMPLAINT BY TELEPHONE  
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of August 8, 2024 in the county of Los Angeles in the Central District of California, the defendant violated:

*Code Section*

18 U.S.C. § 1546

*Offense Description*Fraud and Misuse of Visas, Permits,  
and Other Documents

This criminal complaint is based on these facts:

*Please see attached affidavit.*

☒ Continued on the attached sheet.

*/s/ Sarah Kim*

*Complainant's signature*

Sarah Kim, Special Agent

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: October 4, 2024

*Judge's signature*

City and state: Los Angeles, California

Hon. Charles F. Eick, U.S. Magistrate Judge

*Printed name and title*

AUSA: Jenna W. Long (213-894-8692)

**AFFIDAVIT**

I, Sarah Kim, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of a criminal complaint and arrest warrant against Hanwen Liu, also known as ("aka") Han Wen Liu, aka Derrick Wong, aka Victor Lao (hereinafter "LIU") for a violation of Title 18, United States Code, Section 1546 (Fraud and Misuse of Visas, Permits, and Other Documents).

2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only, all amounts or sums are approximate, and all dates and times are on or about those indicated.

**II. BACKGROUND OF AGENT**

3. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), United States Department of Justice, and have been so employed since September 2018. I am currently assigned to the Los Angeles Field Office and have been with an International Terrorism Extraterritorial Squad that is part of

the Joint Terrorism Task Force since March 2019. My squad, among other things, is responsible for Southeast Asia, which includes the Philippines. We are responsible for investigating major incidents including major violent crime matters occurring in that area against the United States and its interests. I have personally served as the Counter Terrorism Acting Assistant Legal Attaché in Jakarta, Indonesia in 2022 and 2023, during which I assisted in numerous investigations, including crimes committed against United States nationals overseas. I have received specialized training in conducting criminal and counter-terrorism investigations and have consulted with my colleagues who have many years of experience investigating criminal and terrorism crimes. Specifically, I have received 19 weeks (approximately 760 hours) of instruction in the fundamentals of law, ethics, behavioral science, interviewing, report writing, firearms, surveillance, defensive tactics, and case management at the FBI Academy in Quantico, Virginia. I have received additional training in evidence collection, electronic devices and data, criminal statutes, and a variety of criminal offenses, including financial and violent crimes.

### **III. SUMMARY OF PROBABLE CAUSE**

4. During the course of an investigation into the kidnapping and subsequent murder of two individuals in the Philippines in late June 2024, the FBI identified a network of several individuals, including LIU, connected to the kidnapping.

5. As detailed below, during the course of the investigation, the FBI learned that LIU has sought entry into

the United States under two different aliases--Derrick Wong and Victor Lao--and submitted false documents and false information in connection with his applications for legal status in the United States.

6. In February 2024, LIU entered the United States using a German passport that said he was Derrick Wong, and that he was born in Tel Aviv, Israel in 1977. Later in 2024, LIU married a naturalized U.S. citizen--Lu Chen ("LU CHEN") and applied for lawful permanent resident status as a result of that marriage. In his application, LIU again gave the name Derrick Wong, stated that he was born in Tel Aviv, Israel in 1977, to parents Ted and Rosa Susskind, and submitted an Israeli birth certificate with this same information.

7. LIU's representations were false. First, records provided by the People's Republic of China government show that LIU's fingerprints match a citizen of the People's Republic of China named Hanwen Liu, that he has an active arrest warrant in China for kidnapping, and that he is a suspect in other possibly related kidnappings in the Philippines. LIU's photograph and fingerprints also match a 2019 visa application for entry to the United States under the name Victor Lao, in which he claimed to be a Philippines national, born in the Philippines. Second, Israeli authorities told the FBI that Israeli records show that the birth certificate LIU submitted under the alias Derrick Wong is actually associated with another person's name, and thus appears to have been altered to list the name "Derrick Wong."

8. After LIU entered the United States, he told an associate that he knew how to get immigration or identity documents from six countries, including the Philippines, Israel, and Germany.

9. For these reasons, as further detailed below, there is probable cause to believe that LIU's lawful permanent resident status application, submitted in August 2024, contained false representations, including as to his name, birthplace, date of birth, and birth parents. Further, there is probable cause to believe that LIU presented a fraudulent birth certificate and a fraudulently obtained German passport in support of his lawful permanent resident status application. Finally, there is probable cause to believe that LIU lied by answering "no" to several questions in this application, including by saying he has never committed any crime, never been charged for any reason by any law enforcement official, and never lied, concealed, or misrepresented any information for admission to the United States or for any other immigration benefit.

#### **IV. STATEMENT OF PROBABLE CAUSE**

10. According to a report I have reviewed from the FBI Assistant Legal Attaché in Beijing, on or about June 20, 2024, two individuals (a dual United States-People's Republic of China citizen and a People's Republic of China citizen) were kidnapped after arriving in Manila, Philippines for a purported business meeting. Both victims' families were contacted using the victims' accounts and asked to pay a ransom; one family transferred \$410,000 as instructed to a cryptocurrency account.

On or about June 25, 2024, approximately nine hours away from Manila, two corpses believed to be the two kidnapped individuals were found. As one of the deceased individuals was a dual United States-People's Republic of China citizen, the FBI began an investigation.

11. One individual that the FBI has been investigating in connection with the kidnappings is Lu Chen ("LU CHEN"), a resident of El Monte, California, within the Central District of California. According to my review of records maintained by United States Citizenship and Immigration Services ("USCIS"), LU CHEN is a naturalized United States citizen. Before her naturalization on June 23, 2010, LU CHEN was a citizen of the People's Republic of China. I have reviewed a United States passport issued for LU CHEN on September 1, 2021, which expires on August 31, 2031. This passport lists her birthplace as China.

12. As detailed below, in May 2024 LIU married LU CHEN in Nevada, and in August 2024 LIU applied for lawful permanent resident status based on that marriage.

**A. LIU Enters the United States in February 2024 Under a False Name and Passport**

13. I have reviewed records maintained by Customs and Border Protection ("CBP") relating to LIU's February 10, 2024 at 10:32 a.m. Eastern Standard Time ("EST") application to enter the United States submitted through the Electronic System for Travel Authorization ("ESTA"). From this application, I learned the following:

a. LIU stated that his name was Derrick Wong, his date of birth was August 8, 1977 and his birthplace was Tel Aviv, Israel.

b. LIU used a German passport with number C4WXF9WGY.

c. LIU answered "No" to the following questions: (1) "Have you ever been issued a passport or national identity card for travel by another country?" (2) "Have you ever been a citizen or national of another country?" and (3) "Have you ever committed fraud or misrepresented yourself or others to obtain, or assist others to obtain, a visa or entry into the United States?"

d. LIU's ESTA was approved on February 10, 2024.

e. LIU entered the United States after submitting an ESTA under the Visa Waiver Program.<sup>1</sup>

14. According to my review of records maintained by CBP, LIU used the above-described German passport to enter the United States by driving across the border at San Ysidro with an

---

<sup>1</sup> Based on my training and experience, the Visa Waiver Program allows citizens or nationals of certain countries, including Germany, to enter the United States without a visitor's visa if their travel is for business or pleasure and less than 90 days in duration. See <https://esta.cbp.dhs.gov/>. Germany is a Visa Waiver country. China is not included in the visa waiver program.

Under this program, LIU was authorized to stay in the United States for 90 days. On July 11, 2024, his approval to remain in the U.S. was denied with a notation that LIU had overstayed his 90-day visa.

individual named Yifei Li<sup>2</sup> on February 12, 2024, at approximately 6:29 p.m. PDT.

15. I have reviewed a photograph of the German passport LIU used to enter the United States. This passport purports to have been issued on June 27, 2022, lists the name Derrick Wong, date of birth as August 8, 1977, and birthplace as Tel Aviv, Israel.

16. According to California Department of Motor Vehicles records that I have reviewed, LIU obtained a California driver's license in May 2024 under the name Derrick Wong, identified his date of birth as August 8, 1977, his height as 5'10" tall, and as having black hair and brown eyes. LIU's address on his driver's license is LU CHEN's El Monte Address.

**B. LIU Applies for Lawful Permanent Resident Status and Provides False Information and a Fake Birth Certificate**

17. I have reviewed records maintained by USCIS relating to LU CHEN's August 8, 2024 Form I-130 Petition for Alien

---

<sup>2</sup> According to my review of records maintained by CBP, Yifei Li entered the United States using a People's Republic of China passport with a visitor visa. Further according to CBP records, on August 6, 2024, Yifei Li submitted an application for a student visa. According to California Department of Motor Vehicles records that I have reviewed, for Yifei Li from April 2024, Yifei Li's address on her driver's license is LU CHEN's El Monte Address.



Relative<sup>3</sup> (the "Petition") made on LIU's behalf.<sup>4</sup> From the Petition, I learned the following:

a. LU CHEN submitted the Petition and stated that LIU was her spouse. The Petition included a marriage certificate issued by the State of Nevada on May 1, 2024. LU CHEN stated LIU has lived with her since March 1, 2024.

b. LU CHEN stated LIU's birthplace was Tel Aviv, Israel, and his date of birth was August 8, 1977. LU CHEN stated that LIU entered the United States on February 12, 2024, using a German passport with number C4WXF9WGY, with an authorized stay under "Visitor for Pleasure" until August 11, 2024.

c. LU CHEN submitted four passport-sized photographs of LIU with the Petition. The individual in these photographs

---

<sup>3</sup> I know, based on my training and experience and from speaking with HSI Special Agents that are familiar with immigration enforcement, that, in the case of a marriage between a U.S. citizen and an alien, the Form I-130, Petition for Alien Relative is completed and submitted to USCIS by the U.S. citizen on behalf of the alien spouse. Once the Form I-130 is approved, the alien spouse completes and signs a Form I-485, Application to Register Permanent Residence or Adjust Status, and submits this to USCIS. Once USCIS receives these forms, the alien spouse is allowed to remain legally in the United States until USCIS adjudicates the petition. If USCIS approves the Form I-485, it will give the alien spouse a conditional resident permit that authorizes the alien to reside and work in the United States for two years. After two years, the U.S. citizen and the alien spouse must file a Form I-751, Request to Remove Conditions, which asks USCIS to remove the conditional residence status. If USCIS approves the Form I-751, it gives the alien spouse unconditional permanent residence status.

<sup>4</sup> While the Petition is signed by LU CHEN and purports to be submitted by her, the envelope lists "Derrick Wong" at an address on North Lincoln Avenue in Monterey Park, California as the from address, and in the Petition as the mailing address it lists care of "Derrick Wong" at that same address.

appears to be the same individual as the photograph on the German passport LIU used to enter the United States and the photograph on LIU's California Department of Motor Vehicles identification discussed in paragraphs 15 to 16 above.

18. I have reviewed records maintained by USCIS relating to LIU's August 8, 2024 I-485 Application to Register Permanent Residence or Adjust Status (the "Application").<sup>5</sup> From the Application, I learned the following:

a. LIU signed the Application under the name Derrick Wong with an ink signature under penalty of perjury. LU CHEN signed as the preparer of the document.

b. The Application listed his physical address as LU CHEN's El Monte Address, his birthplace as Tel Aviv, Israel, with a date of birth of August 8, 1977, with a German passport with number C4WXF9WGY, having arrived in the United States on February 12, 2024, as a visitor.

c. Among the questions asked in the Application were: (1) "Have you ever been denied admission to the United States?" (2) "Have you ever been denied a visa to the United States?" (3) "Have you ever been arrested, cited, charged, or detained for any reason by any law enforcement official?" (4) "Have you ever committed a crime of any kind (even if you were not arrested, cited, charged with, or tried for that crime)?" (5) "Have you ever been a defendant or the accused in a criminal proceeding?" (6) "Have you ever engaged in money laundering or

---

<sup>5</sup> The Application indicated it was signed on August 8, 2024. The postmark on the mailing label on the envelope it was sent in was also dated August 8, 2024.

have you ever knowingly aided, assisted, conspired, or colluded with others in money laundering?" (7) "Have you ever committed, threatened to commit, attempted to commit, conspired to commit, incited, endorsed, advocated, planned, or prepared: [several other crimes] kidnapping?" (8) "Have you ever submitted fraudulent or counterfeit documentation to any U.S. Government official to obtain or attempt to obtain any immigration benefit, including a visa or entry into the United States?" and (9) "Have you ever lied about, concealed, or misrepresented any information on an application or petition to obtain a visa, other documentation required for entry in the United States, admission to the United States, or any other immigration benefit?" LIU answered no to all these questions.

d. As part of the Application, LIU submitted a Report of Immigration Medical Examination and Vaccine Record signed by LIU, under the name Derrick Wong, on August 1, 2024. Attached to this report is a document that purports to be a birth certificate issued by the Ministry of the Interior of the State of Israel in the name of "Derrick Wong" born on August 8, 1977 to Ted and Rosa Susskind at Ichilov Hospital in Tel Aviv, Israel. This birth certificate lists identity number<sup>6</sup> 011026945.

19. According to USCIS, the Application was denied for "failure to pay." LIU presently does not have lawful status as he has overstayed his visa.

---

<sup>6</sup> I understand this number to be issued by the State of Israel to citizens at birth or at entry to the country, similar to a social security number in the United States.

20. According to the Israeli National Police, identity number 011026945 does not belong to Derrick Wong, but an Israeli citizen with a different name, different birth date (but also born in 1977), and a different German passport number.

21. Based on my knowledge of the investigation, I believe that LIU made false representations in his I-485 Application, including about his name, birthplace, date of birth, birth parents, and physical address. I also believe that the German passport he relied upon was fraudulently obtained. I further believe, based on my knowledge of the investigation, that LIU lied when he answered "no" to several of the questions referred to above in paragraph 18.c.

**C. Photographs and Fingerprints Belonging to LIU, "Derrick Wong," and "Victor Lao" All Match**

22. Following the June 2024 Philippines kidnapping described above, the government of the People's Republic of China provided the FBI information about individuals they had identified as involved in the kidnapping as well as other potentially related kidnappings. One of the individuals identified by the government of China was LIU. According to the People's Republic of China government, an alias LIU has been known to use is "Victor Uy Lao."

**1. "Victor Lao's" 2019 Visa Application**

23. I have reviewed records maintained by the Department of State including records from the Consular Electronic Application Center ("CEAC"), which is a website that allows people to apply for a nonimmigrant visa to the United States.

Specifically, I reviewed the CEAC application and related documents to a January 28, 2019 application for a temporary visitor in the name of "Victor Lao," including a photograph. This visa application listed "Victor Lao's" date of birth as July 2, 1976, and birthplace as Bacolod City, Philippines, with a Philippines passport with number P5591855A. "Victor Lao" said he was then a permanent resident of Malta. The parents listed on this visa application are different from the parents listed on LIU's August 2024 Application and Petition discussed above. As part of the visa application process, "Victor Lao" had his fingerprints taken, which were maintained within Department of State records.

## 2. LIU's Records

24. I have seen a People's Republic of China passport, with number E48381215, issued on April 8, 2015, in the name of "Hanwen Liu," with a 1980 date of birth, and which included a photograph. According to this passport, LIU's birthplace was Shandong, which I know to be a province in China. The Residence Registration card for this same individual, provided by the People's Republic of China, lists LIU's birthplace as Jinan City, Shandong Province, People's Republic of China.

25. I have seen a birth certificate that the People's Republic of China provided for LIU. According to the translation by an FBI linguist, the birth certificate is in the name of "Liu Hao,"<sup>7</sup> with the same date of birth listed on LIU's

---

<sup>7</sup> I understand that it is common for Chinese surnames to sometimes come first and for the first name to be listed second.

passport, with a Shandong Province People's Hospital<sup>8</sup> Hospitalization Department stamp. According to the People's Republic of China, the birth name Hao Liu is a name that LIU has used.

26. I have seen an Interpol Red Notice associated with this passport. According to the Interpol Red Notice, LIU has been charged with Article 176 (Illegally Absorbing Deposits from the Public) by the People's Republic of China government. This Interpol Red Notice included a photograph.

27. The photographs of the individuals described above (including photographs in LIU's passport and Interpol Red Notice; Victor Lao's CEAC application; and Derrick Wong's German passport, California Department of Motor Vehicles identification card, and passport-sized photographs submitted with the Petition for lawful permanent resident status) all appear to be the same individual.<sup>9</sup>

---

<sup>8</sup> I understand that this hospital is located in Jinan, a city in Shandong Province, China, which is the same city listed as Hanwen Liu's birthplace in his People's Republic of China Residence Registration Card.

<sup>9</sup> According to my review of the photographs, I believe them to be of the same person. In my opinion, the eyebrow shape, nostril size, thickness of lips, and overall face shape appear to be consistent throughout all the photographs. The photographs of LIU, Victor Lao, and Derrick Wong appear to be the same person over a period of age progression. The photograph of LIU appears to be from when he was much younger and without facial hair. The more recent photos connected to the name Derrick Wong appear to show the same person who gained weight and has overall more of a swollen appearance. The images were submitted to the FBI's Digital Evidence Laboratory - Video Forensic Analysis Unit to compare the images to determine whether they were the same person. According to the report, "multiple class characteristic similarities" were observed. However, due to "lack of visible distinguishing characteristics," a certain match could not be determined.

28. I have also reviewed an arrest warrant provided to the FBI by the People's Republic of China government during the course of this investigation. According to the translation of this document by an FBI linguist, it is for "Han wen Liu" with same date of birth listed on LIU's passport and birth certificate. It lists the offense as kidnapping. In addition to this warrant, the People's Republic of China also provided the fingerprints of "Han wen Liu."

3. LIU's Fingerprints Match Fingerprints Taken from "Derrick Wong" and "Victor Lao"

29. A Biometric Images Examiner within the FBI's Special Processing Center-Biometric Technology Center compared the fingerprints from the above-described People's Republic of China arrest warrant for LIU with the fingerprints of "Victor Lao" from the CEAC application, and the fingerprints of "Derrick Wong" from his border crossing on February 12, 2024. According to the Biometric Images Examiner, the three sets of fingerprints all appear to be from the same individual.

30. The matching photographs and fingerprints, as well as the other facts discussed above, further demonstrate that LIU made false representations in his I-485 Application, including about his name, birthplace, date of birth, birth parents, and physical address. Specifically, the evidence indicates that rather than being "Derrick Wong," a German citizen born in Israel in 1977, as claimed in the I-485 Application, he is in fact Hanwen (or Han Wen) Liu, a citizen of the People's Republic

of China, born in the Shandong province of China in 1980, with warrants for his arrest in China.

**D. Person-1 Provides Information about LIU to the FBI**

31. In or around February 2024 an individual referred to hereinafter as Person-1<sup>10</sup> submitted online tips to the Los Angeles Police Department and USCIS that an individual known as "Derrick Wong" was committing immigration fraud. Person-1 identified "Derrick Wong's" California Department of Motor Vehicles photograph as the individual Person-1 knows as "Derrick Wong." Based on my subsequent interviews with Person-1 and my review of reports of other FBI agents' interviews with Person-1, I learned the following:

a. Person-1 assists newly immigrated Chinese citizens with services, for example getting vehicles, lodging, or legal assistance, for a fee. LIU (under the alias Derrick Wong) contacted Person-1 for assistance while LIU was in Mexico before entering the United States. LIU told Person-1 that he previously was denied entry to the United States when using his Chinese passport and was concerned about using his German passport to enter the United States, as his fingerprints would match his Chinese passport. Person-1 told LIU that with a German passport LIU could file an application online for ESTA.

---

<sup>10</sup> The FBI has the identifying information for Person-1 and can provide it to the Court if helpful. According to Person-1, he left China after leaders of the large state sponsored company he worked for laundered money through Person-1's personal bank accounts and his account was frozen. According to CBP records I reviewed, Person-1 entered the United States across the border with Mexico in August 2022 and he has applied for asylum, which is still pending.



I recognize the address that LIU provided on his ESTA application as described in paragraph 13 above as Person-1's address.

b. LIU texted Person-1 a picture of his German passport, which Person-1 showed me and which I recognize to match LIU's German passport described above, in the name of Derrick Wong. LIU told Person-1 he was able to get a German passport by exploiting "German Legislation 116."<sup>11</sup> According to what LIU told Person-1, individuals were able to file for Israeli documents at German Embassies in Ireland and London for a fee of \$600,000 and it took 12 to 14 months to complete the process. LIU told Person-1 that he knew of ways to obtain identities and papers for individuals in Germany, Israel, Cyprus, Malta, Hungary, and the Philippines.

c. Person-1 said he met with LIU in person at the Pendry Hotel in Newport Beach on or about February 13, 2024. Person-1 had, at LIU's request, rented a vehicle for LIU to use. Person-1 also assisted LIU with opening both Bank of America and Chase bank accounts.

d. On February 26, 2024, after Person-1 held onto LIU's credit card until LIU paid Person-1 the agreed upon fee for his assistance with getting the card, LIU told Person-1 to delete all photos and passport information he had of LIU's. LIU

---

<sup>11</sup> According to my review of a German website, Article 116 allows individuals who were deprived of their German nationality by persecution under the Nazi regime to renationalize.

told Person-1 that if Person-1 did not do this, LIU's boss<sup>12</sup> was powerful and could make anyone disappear. In his last contact with LIU, LIU asked Person-1 why Person-1 had been asking others about LIU.

**E. Immigration-Related Communications Between LIU and LU CHEN**

32. On July 31, 2024, the Honorable Alicia G. Rosenberg, United States Magistrate Judge, issued a search warrant for the information associated with six Apple accounts linked to LU CHEN and this investigation. From my review of the records, I saw the following items:

a. Within this account's photo library, I saw a photograph of a Mexico Resident Identity Card in the name of "Derrick Wong." I recognize the individual pictured in this identity card to appear to be the same individual shown in the three passports discussed above, held under the following names: (1) LIU's German passport, in the name "Derrick Wong"; (2) LIU's Philippines passport, in the name "Victor Lao"; and (3) LIU's Chinese passport, in the name "Hanwen Liu." Although the photos appear to be of LIU, on the Mexico Resident Identity Card his face is swollen and bruised around the eyes. The last modified date of this photograph was April 1, 2024. I recognize this Mexico Resident Identity Card to be the same Mexico Resident Identity Card Person-1 included in Person-1's tip.

---

<sup>12</sup> At another time, LIU told Person-1 that his boss had a red notice and asked how to avoid getting in trouble when he enters the United States for the red notice. Person-1 has never had any contact with, seen, or been given any method to contact LIU's "boss," as such, Person-1 does not believe LIU has a boss.

b. Within this account's messaging application I saw a text message exchange on March 27, 2024, between a phone number LU CHEN told me belonged to her and a phone number identified by LU CHEN's daughter and Person-1 as belonging to "Derrick Wong." In the exchange, as translated by an FBI linguist, LU CHEN wrote, "what citizenship are you?" LIU responded, "Germany."

**F. LU CHEN and Her Daughter Gave Conflicting Information About LIU**

33. On or about July 14, 2024, when LU CHEN was departing from Los Angeles International Airport ("LAX") for a flight to Korea with her daughter, Customs and Border Protection ("CBP") interviewed both of them, separately. LU CHEN said she had known LIU--whom she identified as Derrick Wong and described as her fiancé--for many years, but she did not know his phone number and would not say where he lived presently. She said that his mother was German and his father was Chinese. LU CHEN told CBP that LIU had a real estate business in Germany and that he was maybe going to sign the deed of a property he owned in Germany over to LU CHEN.

34. LU CHEN's daughter said that LIU--whom she also identified as Derrick Wong and described as her mother's boyfriend of one year--lived with her, her mother (LU CHEN), and her grandmother at LU CHEN's El Monte Address. LU CHEN's daughter also provided a phone number for LIU.

35. On July 25, 2024--approximately 11 days after the above-described interviews--according to CBP records, LU CHEN

and her daughter were interviewed again when they returned to the United States. In this interview, which was conducted by FBI Special Agents, including one fluent in Mandarin and English, LU CHEN said that while LIU had been staying at LU CHEN's El Monte address, he did not feel comfortable with three generations of women in the house, so he was no longer staying there. She said she had known LIU for "a long time," but would not provide dates or a timeline of their relationship, but explained that because they were both single at the time, they decided to get married.

**G. From Late June 2024 through September 2024, LIU Has Been Staying at Hotels with Yifei Li**

36. On July 20, 2024, I viewed video surveillance from the Pendry Newport Beach, a hotel in Newport Beach, California (the "Pendry"). On this video surveillance, which was recorded on June 28, 2024, I saw an individual I recognized to be LIU based on the previously described photographs at the front desk with an Asian female, who I recognized to be Yifei Li--the same female LIU entered the United States with in February 2024, as described in paragraph 14 above--based on Yifei Li's People's Republic of China passport and California Department of Motor Vehicles photographs.

37. I viewed additional video surveillance from the Pendry in which I saw LIU driving, parking, and exiting a black BMW XM,<sup>13</sup> which I then saw Yifei Li get out of the backseat of. According to the valet staff at the Pendry that I spoke to, the

---

<sup>13</sup> This is the same car that Person-1 described as being driven by LIU (as discussed in Section IV.D. below).

black BMW XM belonged to Yifei Li but it was always driven by LIU, as identified from his California Department of Motor Vehicles photograph.

38. FBI agents conducting surveillance in the vicinity of the Pendry saw LIU and Yifei Li on the following occasions, among other times: twice on July 25, 2024, July 26, 2024, and July 31, 2024.

39. According to the Pendry, Yifei Li extended her reservation multiple times before checking out on August 5, 2024.

40. I viewed video surveillance from the Park Lane Hotel New York in New York, New York (the "Park Lane"). On this video surveillance, which was recorded on August 12, 2024, I saw an individual I recognized to be LIU at the front desk with Yifei Li. According to the Park Lane, Yifei Li extended her reservation multiple times before checking out on September 5, 2024.

41. I viewed video surveillance from M Social Hotel New York Times Square in New York, New York ("M Social"). On this video surveillance, which was recorded on September 5, 2024, I saw individuals I recognized to be Yifei Li and LIU at the check-in counter. According to M Social. According to M Social, Yifei Li checked out on September 17, 2024.

I viewed video surveillance from Romer Hell's Kitchen Hotel in New York, New York (the "Romer"). On this video surveillance, which was recorded on September 17, 2024, I saw individuals I recognized to be Yifei Li and LIU enter the Romer and LIU sat

down in the lobby area as Yifei Li checked-in at the front desk. According to the Romer, Yifei Li checked out on September 20, 2024, and during her stay "Derrick Wong" was a listed guest of Yifei Li's room.

**H. Training and Experience Concerning Immigration Fraud**

42. Based on my training and experience, as well as conversations with HSI Special Agents familiar with immigration fraud, the methods employed by individuals attempting to fraudulently obtain immigration and citizenship benefits include entering the United States pursuant to a limited-stay and limited-purpose visa (for example, a tourist visa, or comparable entry under the Visa Waiver Program as explained in n. 1); extending or changing the limited-stay/limited-purpose status through a fraudulent marriage to a United States citizen; submitting fake, altered, or fraudulent documents to USCIS; making false or deceptive statements to immigration officials or in applications; and testifying falsely under oath (which includes including false information in applications that are signed under the penalty of perjury) in immigration interviews and proceedings.

43. I understand that individuals engaged in immigration fraud often use immigration documents obtained through fraud for various purposes, including obtaining social security cards, driver's licenses, credit cards, and bank accounts; obtaining employment and employment-related licenses and permits; and re-entering the United States after foreign travel. I further understand that it is common for these individuals to have

multiple identities that they use to travel between countries without detection and without lawful authority. Further it is not uncommon for individuals engaged in immigration fraud to give the United States citizens that they use to adjust their status (for example by marriage) to provide those United States citizens with benefits or other compensation.

**V. CONCLUSION**

44. For all of the reasons described above, there is probable cause to believe that Hanwen Liu, aka Han Wen Liu, aka Derrick Wong, aka Victor Lao, has committed a violation of Title 18, United States Code, Section 1546 (Fraud and Misuse of Visas, Permits, and Other Documents).

Attested to by the applicant in  
accordance with the requirements  
of Fed. R. Crim. P. 4.1 by  
telephone on this 4th day of  
October, 2024.

A handwritten signature in black ink, appearing to read 'Charles F. Eick', written over a horizontal line.

THE HONORABLE CHARLES F. EICK  
UNITED STATES MAGISTRATE JUDGE